

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Joseph Friel)	Civil Action No. 3:24-cv-1866-JKM
)	
Plaintiff,)	
)	
vs.)	
)	
Line 5, LLC, et al.)	
)	
Defendant.)	
)	
)	
)	
)	
)	

**CERTIFICATION OF ELYSE N. COHEN
IN SUPPORT OF APPLICATION FOR
ADMISSION PRO HAC VICE OF TORI L. GUIDRY**

ELYSE COHEN, an attorney duly admitted to the bar of this Court, hereby moves to admit
Tori L. Guidry, Esq. as counsel *pro hac vice* in this matter and in support thereof, certifies pursuant
to Local Civil Rule 83.8.2.1 as follows:

1. I am an attorney with the law firm of Nelson Mullins Riley & Scarborough LLP,
counsel for Defendant JEA Management Services, d/b/a Covered Auto (“JEA”) in this action. I
make this Certification pursuant to Local Civil Rule 83.8.2.1 and the Court’s Policies governing
pro hac vice motion applications in support of JEA’s application for the admission *pro hac vice* of
Tori L. Guidry of Troutman Amin LLP.

2. I am duly admitted to the bars of the Commonwealth of Pennsylvania, bar
identification number 320787 and the State of New Jersey, bar identification number 155212015.
I am also admitted to the bars of the United States District Courts for the District of New Jersey,
Middle District of Pennsylvania, and Eastern District of Pennsylvania. No disciplinary
proceedings are pending against me and no discipline has previously been imposed upon me in
any jurisdiction.

3. I know or after reasonable inquiry believe that Ms. Guidry's private and personal character is good.

4. Ms. Guidry has been specifically retained by JEA to represent it in this litigation because of her established relationship with JEA.

5. If this Honorable Court grants the *pro hac vice* application of Ms. Guidry, I will continue to serve as associate counsel of record in this matter, will review and sign all pleadings, briefs and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorneys admitted *pro hac vice*, will accept service of all papers filed with the Court in this action, will be prepared to attend any hearing of any motion or the taking of any testimony, and be fully prepared to participate in any hearings, conferences, and trials, and will otherwise comply with all the terms and conditions of the Local Civil Rules of Civil Procedure and this Honorable Court's Policies.

I hereby certify under penalty of perjury that the foregoing statements made by me are true and correct.

Respectfully submitted,

Dated: January 17, 2025

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Elyse N. Cohen

Elyse N. Cohen

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Berwyn, PA 19312

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Attorneys for Defendant JEA Management

Services d/b/a Covered Auto

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I, TORI L. GUIDRY, state the following of my own personal knowledge:

1. I am an attorney at the firm of Troutman Amin LLP, 400 Spectrum Center Drive, Suite 1550, Irvine, CA 92618.

2. I am familiar with the facts of this case.

3. I am admitted to practice before the courts of the State of Louisiana with bar identification number 37704. I was admitted to practice in State of Louisiana in 2017 and the office maintaining the roll of members admitted to its bar is The Louisiana State Bar Association, 601 St. Charles Avenue, New Orleans, LA 70130.

4. I am also admitted to practice in the U.S. District Court for the Eastern District of Louisiana (2012).

5. I am a member in good standing of the State Bar of Louisiana. I am also a member in good standing in all United States Courts to which I have been admitted to practice.

7. I have never been under suspension or disbarments by any of the above courts, or by any other court of jurisdiction.

8. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has been previously imposed on me in any jurisdiction.

9. I agree to be bound by the Local Rules of Civil Procedure, the Rules of Professional Conduct, and the Code of Professional Conduct for the duration of this case.

10. If this Honorable Court grants this application, I will in good faith continue to advise Elyse Cohen, counsel who moved for my *pro hac vice* admission, of the current status of the case for which my *pro hac vice* status has been granted and of all material developments in the case.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

TROUTMAN AMIN LLP

/s/ *Tori L. Guidry*
Tori L. Guidry, Esquire

Date: January 17, 2025

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I caused the application for Tori L. Guidry to appear and to participate in the captioned matter *pro hac vice* to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filings to all counsel of record.

CERTIFICATE OF CONCURRENCE

Pursuant to Local Rule 7.1, I hereby certify that all parties' concurrence for the relief sought from this Motion was requested by electronic mail on January 16, 2025. No opposition was received.

Dated: January 17, 2025

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Elyse N. Cohen

Elyse N. Cohen

1000 Westlakes Drive, Suite 275

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Ph (610)-943-5354

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***Attorneys for Defendant JEA Management
Services, d/b/a Covered Auto***